

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB
	MDL No. 2323
THIS DOCUMENT RELATES TO:	Hon. Anita B. Brody
<i>Lewis, et al. v. Kansas City Chiefs Football Club, Inc.</i>	No. 14-cv-01995-AB
and	
<i>Smith, et al. v. Kansas City Chiefs Football Club, Inc.</i>	No. 14-cv-03383-AB
and	
<i>Kenney, et al. v. Kansas City Chiefs Football Club, Inc.</i>	No. 14-cv-04779-AB
and	
<i>Smith, et al. v. Arizona Cardinals Football Club, LLC</i>	No. 16-cv-01704-AB

**DECLARATION OF DENNIS L. CURRAN**

**DENNIS L. CURRAN**, being duly sworn, deposes and says:

1. I am a Senior Vice President of the National Football League ("NFL") and General Counsel of the National Football League Management Council ("NFLMC"). The NFLMC is the sole and exclusive bargaining representative of the 32 Member Clubs of the NFL. I have been the General Counsel of the NFLMC since 1990. I make this this declaration, on personal knowledge, in support of the Kansas City Chiefs Football Club, Inc. and the Arizona Cardinals Football Club, LLC's Joint Opposition to Plaintiffs' Motions to Remand.

2. Attached as Exhibit 1 is a true and correct copy of the published version of the 1970 Collective Bargaining Agreement (“CBA”) between the NFLMC and the National Football Players’ Association (“NFLPA”) effective February 1, 1970.

3. Attached as Exhibit 2 is a true and correct copy of the published version of the 1977 CBA between the NFLMC and the NFLPA effective February 1, 1974.

4. Attached as Exhibit 3 is a true and correct copy of the published version of the 1982 CBA between the NFLMC and the NFLPA effective July 16, 1982.

5. Attached as Exhibit 4 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA dated March 29, 1993.

6. Attached as Exhibit 5 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended June 6, 1996.

7. Attached as Exhibit 6 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended February 25, 1998.

8. Attached as Exhibit 7 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended January 8, 2002.

9. Attached as Exhibit 8 is a true and correct copy of the published version of the 2006 CBA between the NFLMC and the NFLPA dated March 8, 2006.

10. Attached as Exhibit 9 is a true and correct copy of the published version of the 2011 CBA between the NFLMC and the NFLPA dated August 4, 2011.

11. Attached as Exhibit 10 is a true and correct copy of the published version of the 1976 Constitution and Bylaws of the NFL.

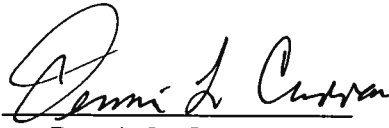
12. Attached as Exhibit 11 is a true and correct copy of the published version of the 1982 Supplement to the Constitution and Bylaws of the NFL.

13. Attached as Exhibit 12 is a true and correct copy of the published version of the 1984 Constitution and Bylaws of the NFL.

14. Attached as Exhibit 13 is a true and correct copy of a redlined comparison of the January 10, 2014 First Amended Petition (ECF No. 4) against the December 10, 2015 Second Amended Petition (ECF No. 5) filed in *Smith v. Arizona Cardinals Football Club, LLC*, No. 15-cv-01903 (E.D. Mo.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2017 at New York, New York.

  
Dennis L. Curran